

**Amendments to the Drawings:**

The attached sheet of drawings includes redrawn Figures 1 and 2a. The replacement sheet is being provided in response to the Office Action objections. In particular, Figures 1 and 2a have been redrawn to clearly illustrate the features of each Figure as requested by the current Office Action.

Attachment: Replacement Sheet

## **REMARKS**

The Office Action of October 16, 2006 has been reviewed and the comments therein were carefully considered. Claims 1-31 and 33 are currently pending. Claims 1-31 and 33 stand rejected.

### **Drawing Objections**

A replacement drawing sheet is being provided in response to the Office Action's drawing objections to Figures 1 and 2a. In particular, Figures 1 and 2a have been redrawn to clearly illustrate the features of Figures 1 and 2a as requested by the current Office Action.

### **Supplemental ADS**

A supplemental ADS is being filed along with this response to provide the residence information for inventor Boakes as requested by the Office Action.

### **Claim Rejections Under USC §112**

*Claims 1-31 and 33 are rejected under 35 USC §112, first paragraph, as failing to comply with the written description requirement.* Applicants respectfully traverse the rejections.

In particular, the Office Action states:

The claims contain new subject matter which was not described in the original specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. In particular, although the specification describes (page 9, lines 26-29) a contact that is deformed and collapsed, it does not suggest "an inside surface of said contact . . . in substantially direct contact with the surface of said rigid substrate" as required by claims 1 and 17. The specification, as originally filed, does not suggest to any person skilled in the art to make this assumption and from the invention commensurate in scope with the claims. Applicant is required to cancel the new matter in the reply to this Office Action.

Applicants respectfully disagree as support for the claimed features may additionally be found on at least page 4, lines 15-17 and page 9, lines 26 to 27 of the application as originally filed. On page 9, the application states "this enables the domes to be almost completely flattened against the substrate if a sufficient force can be applied." If a dome is flattened against the

substrate then its interior surface is against the substrate. Therefore, Applicants respectfully submit that there is support for an inside surface of the contact being in substantially direct contact with the surface of the rigid substrate. Therefore, for at least this reason, Applicants respectfully submit that claims 1-31 and 33 are in condition for allowance.

*Claims 7 and 23 are rejected under 35 USC §112, second paragraph, as being indefinite in failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.* Applicant respectfully traverses the rejection.

In particular, the Office Action states:

The requirement that the PCB be flexible is contradictory to the requirement of claims 1 and 17 (from which these claims respectively depend) that the substrate, which comprises the PCB, be rigid. Although the application discloses a preferred embodiment (Fig. 4) having the contact on a flexible PCB substrate, claims 1 and 17 now require that the contact be directly on a rigid substrate (Fig. 5). There is no disclosure (or arrangement imagined by the examiner) that would encompass the rigid substrate of claims 1 and 17 and the flexible PCB of claims 7 and 23.

Applicants respectfully disagree as support for the claimed features may be found on at least page 11, lines 8 to 9. This section describes an embodiment in which the substrate may be rigid because of the rigid frame but also comprises a flexible PCB. Therefore, for at least this reason, Applicants respectfully submit that claims 7 and 23 are in condition for allowance.

## **Claim Rejections Under USC §102**

*Claims 1, 2, 4, 6, 8-9, 11, 17-18, 20-22, 24 and 27, absent new matter discussed, are rejected under 35 USC §102(b) as being anticipated by WO 98/41946 (“Odic”).* Applicants respectfully traverse the rejections.

Embodiments of the invention relate to an electrical connector for connection to a mating connector. Such a connector may be suitable for use with removable data cards, for instance SIM cards. The connector has contacts that are resiliently deformable hollow projections. When a force is applied to the contacts, for instance when a mating connector is connected, the contact resiliently deforms to bring the mating connector closer to the substrate. This deformation reduces the volume of the connector.

Independent claims 1 and 17 include the claimed feature of “said contact to move between a fully collapsed deformed state and a fully extended undeformed state.” Applicants

respectfully submit that Odic does not disclose, teach, or suggest at least this claimed feature. In particular, at least one difference between the claimed invention and Odic is that in independent claims 1 and 17, the contacts deform to bring the mating connector closer to the substrate to reduce the space taken up by the connector system. In Odic, when a card is inserted into the connector, the contacts 2 deform but the insulative plate 3 prevents a card from getting any closer to the substrate 10. The other documents of record do not make up for the deficiencies in Odic. Therefore, for at least this reason, Applicants respectfully submit that independent claims 1 and 17 are in condition for allowance. Dependent claims 2-16, 18-31 and 32, ultimately depend from one of independent claims 1 and 17 and are allowable for at least the same reasons as the independent claim from which they ultimately depend.

### **Claim Rejections Under USC §103**

*Claims 3 and 19 are rejected under 35 USC §103(a) as being unpatentable over WO 98/41946 (“Odic”) in view of the Research Disclosure cited by applicant.* Applicants respectfully traverse the rejection. Dependent claims 3 and 19 ultimately depend from one of independent claims 1 and 17 and are allowable for at least the same reasons as the independent claim from which they ultimately depend.

*Claims 5, 10, 21 and 26 are rejected under 35 USC §103(a) as being unpatentable over WO 98/41946.* Applicants respectfully traverse the rejection. Dependent claims 5, 10, 21 and 26 ultimately depend from one of independent claims 1 and 17 and are allowable for at least the same reasons as the independent claim from which they ultimately depend.

*Claims 12, 13, 28 and 29 are rejected under 35 USC §103(a) as being unpatentable over WO 98/41946 in view of Reichardt.* Applicants respectfully traverse the rejection. Dependent claims 12, 13, 28 and 29 ultimately depend from one of independent claims 1 and 17 and are allowable for at least the same reasons as the independent claim from which they ultimately depend.

*Claims 14-16, 25, 30-31 and 33 are rejected under 35 USC §103(a) as being unpatentable over WO 98/41946.* Applicants respectfully traverse the rejection. Dependent claims 14-16, 25, 30-31 and 33 ultimately depend from one of independent claims 1 and 17 and are allowable for at least the same reasons as the independent claim from which they ultimately depend.

Applicants therefore respectfully request reconsideration of the pending claims and a finding of their allowability. A notice to this effect is respectfully requested. Please feel free to contact the undersigned should any questions arise with respect to this case that may be addressed by telephone.

Respectfully submitted,

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